

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0078484; AI 52278; PER20050001** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Total Environmental Solutions, Inc.
Med South
1824 Ryder Drive
Baton Rouge, LA 70808
- II. **PREPARED BY:** Todd Franklin
- DATE PREPARED:** March 22, 2006
- III. **PERMIT ACTION:** reissue LPDES permit LA0078484, AI 52278; PER20050001
- LPDES application received: September 15, 2005
- EPA has not retained enforcement authority.
- LPDES permit issued: April 1, 2001
 LPDES permit expired: March 31, 2006

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a privately owned treatment facility serving the Med South Medical Complex and the adjacent apartments.
- B. The permit application does not indicate the receipt of industrial wastewater.
- C. The facility is located west of I-49 and south of Opelousas, St. Landry Parish.
- D. The treatment facility consists of extended aeration. Disinfection is by chlorination.
- E. Outfall 001

Discharge Location: Latitude 30° 28' 12" North
 Longitude 92° 4' 53" West

Description: treated sanitary wastewater

Average Expected Flow: 90 hospital beds @ 200 GPD each = 18,000 GPD
 335 employees @ 20 GPD each = 6,700 GPD
 8 one-BR apartments @ 250 GPD each = 2,000 GPD
 56 two-BR apartments @ 300 GPD each = 16,800 GPD
 4 washing machines @ 400 GPD each = 1,600 GPD

Total Expected Flow: 45,100 GPD

Calculations for gallons per day were based upon figures obtained from Chapter 15 of the State of Louisiana Sanitary Code, Department of Health and Hospitals, Office of Public Health.

Type of Flow Measurement which the facility is currently using:

V-Notch Weir and/or bucket and stopwatch

V. RECEIVING WATERS:

The discharge is into an unnamed ditch; thence into Bayou Sylvain; thence into Bayou Bourbeux in segment 060801 of the Vermilion - Teche River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 060801 of the Vermilion - Teche River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Not Supported	Not Supported	Not Supported	N/A	N/A	N/A	Full

^{1/}The designated uses and degree of support for Segment 060801 of the Vermilion - Teche River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 060801 of the Vermilion - Teche River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005, from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 060801; Vermilion River-Headwaters at Bayou Fusilier-Bourbeaux junction to New Flanders Bridge, Hwy. 3073; is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, suspended solids/turbidity/siltation, and carbofuran, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060801:

1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen

This TMDL re-established that NPDES permits for individual point sources in the Vermilion Watershed should continue to be issued on the basis of flow rates as follows:

FLOW RATE

greater than 25,000 gpd

25,000 gpd or less

PERMIT LIMITS

May - Dec.: 10 mg/l CBOD₅/5 mg/l NH₃-N/5 mg/l DO

Jan. - April: 20 mg/l CBOD₅/10 mg/l NH₃-N/5 mg/l DO

secondary limits year round

Therefore, this discharge will be permitted accordingly.

Vermilion River TMDL for Fecal Coliform

The *Vermilion River TMDL for Fecal Coliform* was finalized on April 5, 2001, addressing the presence of pathogen indicators in the watershed. As per this TMDL, "...there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL." Therefore, Fecal Coliform effluent limitations will remain in this permit.

TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin

As per the *TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin*, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Therefore, TSS limits will remain as previously permitted.

TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion-Teche River Basins

The *TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion-Teche River Basins* was finalized on March 21, 2002, and states no point sources are known to discharge Carbofuran; therefore, no allocation was given to point source discharges in the Vermilion-Teche River Basin.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD ₅				Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.
May – December	N/A*	10 mg/l	15 mg/l	
January – April	N/A*	20 mg/l	30 mg/l	Limits are set through Best Professional Judgement (BPJ) in a manner consistent with technology based limits and the previous permit.
TSS				
May – December	N/A*	15 mg/l	23 mg/l	Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.
January - April	N/A*	20 mg/l	30 mg/l	
Ammonia-Nitrogen				Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.
May – December	N/A*	5 mg/l	10 mg/l	
January - April	N/A*	10 mg/l	20 mg/l	Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.
Dissolved Oxygen**	---	5 mg/l	N/A	

*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD₅ and TSS in terms of concentration.

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.).

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X.

PREVIOUS PERMITS:

LPDES Permit No. LA0070769: Issued: February 1, 2001
Expired: January 31, 2006

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	1/week	Measure
CBOD ₅				
April-November	10 mg/l	15 mg/l	2/month	Grab
December-March	20 mg/l	30 mg/l	2/month	Grab
TSS				
April-November	15 mg/l	23 mg/l	2/month	Grab
December-March	20 mg/l	30 mg/l	2/month	Grab
Ammonia-Nitrogen				
April-November	5 mg/l	10 mg/l	2/month	Grab
December-March	10 mg/l	20 mg/l	2/month	Grab
Dissolved Oxygen	5 mg/l minimum		2/month	Grab

Fecal Coliform				
Colonies/100 ml	200	400	2/month	Grab
TRC	Report	Report	2/month	Grab
pH	Range (6.0 su – 9.0 su)		2/month	Grab

The TRC reporting requirement has been removed from this draft permit. Calculations based on the last two years of data as reported on the DMRs revealed that no Water-Quality Based Limit was required. See the attached calculations for more information.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspection was performed for this facility.

Date – November 1, 2004

Inspector - LDEQ

Findings and/or Violations –

1. The facility is an above ground extended aerator unit. Both wet well pumps are operational. Both motors for the aerator are operational.
2. Chlorine tablets were located in the contact tubes.
3. Flow is measured by a template on the contact Chamber.
4. Effluent was clear.
5. Inspector was unable to locate the outfall pipe (underwater).
6. The review of the Discharge Monitoring Reports from 10/1/2003 through 9/30/2004 revealed the following:

The effluent did not meet the minimum monthly average for Dissolved Oxygen three times during the review period. The causes of the lack of oxygen included that dissolved oxygen improvements were under way and a lack of air in the chlorine contact chamber. The corrective actions included installing five air diffusers and increasing the air supply to the chamber. Also during the review period, the monthly average TSS limitation was exceeded five times and the weekly average TSS limitation was exceeded once. The cause of the exceedances included inadequate chlorine contact chamber maintenance and the chamber needing to be pumped out. Maintenance of the chlorine contact chamber was increased and it was scheduled to be pumped out.

No spills were noted at the facility from 10/1/2003 through 11/1/2004.

B) Compliance and/or Administrative Orders

A review of the files indicates that no recent enforcement actions have been administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning January 2004 through December 2005 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
TSS, Monthly Avg.	001	January 2004	20 mg/l	28.45 mg/l
TSS, Weekly Avg.	001	January 2004	30 mg/l	30.40 mg/l

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TSS, Monthly Avg.	001	February 2004	20 mg/l	20.40 mg/l
DO, Monthly Avg.	001	April 2004	5 mg/l minimum	3.71 mg/l
DO, Monthly Avg.	001	June 2004	5 mg/l minimum	4.90 mg/l
TSS, Monthly Avg.	001	July 2004	15 mg/l	15.15 mg/l
TSS, Monthly Avg.	001	November 2004	15 mg/l	23.80 mg/l
TSS, Weekly Avg.	001	November 2004	23 mg/l	36.80 mg/l
DO, Monthly Avg.	001	July 2005	5 mg/l minimum	4.55 mg/l
DO, Monthly Avg.	001	August 2005	5 mg/l minimum	4.59 mg/l

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

The **Monitoring Requirements, Sample Types, and Frequency of Sampling** for this facility shall be as follows:

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	1/week	Measure
CBOD ₅	2/month	Grab
Total Suspended Solids	2/month	Grab
Ammonia-Nitrogen	2/month	Grab
Dissolved Oxygen	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

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Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Total Environmental Solutions, Inc., Med South, September 15, 2005.

APPENDIX B-1

Water Quality Screen

Wgsmodn wk4	Date:	03/22/06	Appendix B-1					Page	1
Developer: Bruce Fielding	Time:	10:00 AM							
Software: Lotus 4.0			LA0078484						
Revision date: 10/22/99									
Input variables:	Water Quality Screen for			TES1 / Med South					
Receiving Water Characteristics:		Dilution: ZID F5 =				Toxicity Dilution Series: Biomonitoring dilution: Dilution Series Factor:		0.41100884 0.75	
Receiving Water Name=	unnamed ditch, thence into Bayou Sylvaunt, thence into Bayou Bourbeux								
Critical flow (Q7) cfs=	0.1	MZ F5 =		0.06463				Percent Effluent	
Harm. meanavg tidal cfs=		Critical Qr (MGD)=		0.06463				54.801%	
Drinking Water=1 HENPCR-2		Harm. Mean (MGD)=		0.874638185				41.1009%	
Mann, 1=y, 0=n		ZID Dilution =		0.41100884				30.8237%	
Rec. Water Hardness=		MZ Dilution =		0.41100884				23.1192%	
Rec. Water TSS=		Hfinc Dilution=		0.41100884				17.3394%	
Fisch/Specific=1, Stream=0		Hfinc Dilution=		0.41100884					
Diffuser Ratio=		ZID Upstream =		0.143303769					
		MZ Upstream =		1.433037694		Partition Coefficients: Dissolved -> Total			
Effluent Characteristics:		MZ/hic Upstream=		1.433037694					
Permittee=	TES1 / Med South					MetALS			
Facility flow (QeF),MGD=	LA0078484	MZ/hic Upstream=		1.433037694		Total Arsenic	FW		
	0.0451	ZID Hardness=		---		Total Cadmium	3.965240965		
		MZ Hardness=		---		Chromium III	4.947655785		
		ZID TSS=		---		Chromium VI	1		
Eff. data, 2=lbs/day		MZ TSS=		---		Total Copper	2.892488893		
MOL, 2=lbs/day						Total Lead	5.437700939		
Effluent Hardness=	N/A	Multipliers:				Total Mercury	3.100864284		
Effluent TSS=	N/A	WLAa -> LTAA		0.32		Total Nickel	2.318852054		
WQBL ind. 0=y, 1=n		WLAa -> LTAA		0.53		Total Zinc	3.494077894		
Acute/Ctr. ratio 0=n, 1=y		LTAA -> WQBL max		1.31					
Acute/c. acute only 1=y, 0=n		LTAA h -> WQBL max		3.11		Aquatic Life: Dissolved			
		WQBL-limit/report		2.38		Metal Criteria, ug/L			
		WQBL-fraction		2.13		MetALS			
Page Numbering/Labeling		WQBL-fraction		2.13		AcUTE			
Appendix	Appendix B-1					Chromium	360	CHRONIC	190
Page Numbers 1=y, 0=n	1					Cadmium	7.053274171	0.381922068	
Input Page # 1=y, 0=n	1					Chromium III	557.9443915	66.50381408	
		Conversions:				Chromium VI	16	11	
Fischer/Site Specific Inputs:		ug/L -> lbs/day Qef		0.000376134		Copper	5.19878426	3.91380716	
Pipe=1 Canal=2 Specific=3		ug/L -> lbs/day Qeo		0		Lead	13.98001661	0.544781177	
Pipe width, feet		ug/L -> lbs/day Qr		0.000834		Mercury	2.4	0.012	
ZID plume dist., feet		lbs/day -> ug/L Qeo		2658.626979		Nickel	438.9427295	48.79700548	
MZ plume dist., feet		lbs/day -> ug/L Qef		2658.626979		Zinc	36.15276695	32.74510504	
Hfinc plume dist., feet		dis -> tot 1=y, 0=n		1					
Hfinc plume dist., feet		Cu dis -> tot 1=y, 0=n		1		Site Specific Multiplier Values:			
		cfs -> MGD		0.6463		CV =			
Fischer/site specific dilutions:						N =			
ZID Dilution =		Receiving Stream:				WLAa -> LTAA			
		Default Hardness=		25		WLAa -> LTAA			
F-specific Hfinc Dilution=		Default TSS=		10		LTAA a.c -> WQBL avg			
F-specific Hfinc Dilution=						LTAA a.c -> WQBL max			
						LTAA h -> WQBL max			

Appendix B-1 TESI / Med South LA0078484											Page
(*)1	(*)2	(*)3	(*)4	(*)5	(*)6	(*)7	(*)8	(*)9	(*)10	(*)11	
Toxic Parameters	Cu Effluent /tech	Effluent /tech	MOI Effluent /tech	95th % estimate	Numerical Criteria	Chronic	HHNDW	HH	Indicator		
Conc. ug/L	(Avg) ug/L	(Max) ug/L	0-95 %	Non-Tech ug/L	FW ug/L	FW ug/L	ug/L	ug/L	"C"		
NONCONVENTIONAL											
Total Phenols (4AAP)			5				700	350	50		
3-Chlorophenol			10								
4-Chlorophenol			10				383	192			
2,3-Dichlorophenol			10								
2,5-Dichlorophenol			10								
2,6-Dichlorophenol			10								
3,4-Dichlorophenol			10								
2,4-Dichlorophenoxy-acetic acid (2,4-D)											
2-(2,4,5-Trichlorophenoxy) propionic acid (2,4,5-TP, Silvex)											
METALS AND CYANIDE											
Total Arsenic			10				681.7686572	359.8223469			
Total Cadmium			1				27.96793168	1.514413029			
Chromium III			10				2760.516796	329.0379804			
Chromium VI			10				16	11			
Total Copper			10				15.03742573	11.3208565			
Total Lead			5				76.01914946	2.962357118			
Total Mercury			0.2				7.442074282	0.037210371			
Total Nickel			40				1017.84325	113.1530564			
Total Zinc			20				126.3205838	114.4139476			
Total Cyanide			20				45.9	5.4	12844		
DIOXIN											
2,3,7,8 TCDD: dioxin			1.00E-05						7.20E-07	C	
VOLATILE COMPOUNDS											
Benzene			10				2249	1125	12.5	C	
Bromoform			10				2930	1465	34.7	C	
Bromodichloromethane			10						3.3	C	
Carbon Tetrachloride			10				2730	1365	1.2	C	
Chloroform			10				2890	1445	70	C	
Dibromochloromethane			10						5.08	C	
1,2-Dichloroethane(EDC)			10				11800	5900	6.8	C	
1,1-Dichloroethylene			10				1160	580	0.58	C	
1,3-Dichloropropylene			10				606	303	162.79		
Ethylbenzene			10				3200	1600	8100		
Methyl Chloride			50				55000	27500			
Methylene Chloride			20				19300	9650	87	C	
1,1,2,2-tetrachloroethane			10				932	466	1.8	C	

Appendix B-1 TEST / Med South LA0078484														Page	3
(*)	(*)2	(*)3	(*)4	(*)5	(*)6	(*)7	(*)8	(*)9	(*)10	(*)11	(*)12	(*)13	(*)14		
Toxic Parameters	WLAS Acute	WLAS Chronic	WLAB HHNDW	LTAa Acute	LTAc Chronic	LTAa HHNDW	Limiting A.C.HH	WQBL Avg	WQBL Max	WQBL Avg	WQBL Max	WQBL Avg	WQBL Max		
Parameters	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	001	001	001	001	lbs/day	lbs/day		
NONCONVENTIONAL															
Total Phenols (4AAP)	800.3126386	851.5631929	121.6518847	256.1000443	451.3284922	121.6518847	121.6518847	121.6518847	289.5314856	0.04575741	0.108902636	no			
3-Chlorophenol	---	---	---	---	---	---	---	---	---	---	---	no			
4-Chlorophenol	437.8853437	467.1432373	---	140.12331	247.5859157	---	140.12331	183.5615361	435.783494	0.069043735	0.163912989	no			
2,3-Dichlorophenol	---	---	---	---	---	---	---	---	---	---	---	no			
2,5-Dichlorophenol	---	---	---	---	---	---	---	---	---	---	---	no			
2,6-Dichlorophenol	---	---	---	---	---	---	---	---	---	---	---	no			
3,4-Dichlorophenol	---	---	---	---	---	---	---	---	---	---	---	no			
2,4-Dichlorophenoxy- acetic acid (2,4-D)	---	---	---	---	---	---	---	---	---	---	---	no			
2-(2,4,5-Trichlorophen- oxy) propionic acid (2,4,5-TP, Silvex)	---	---	---	---	---	---	---	---	---	---	---	no			
METALS AND CYANIDE															
Total Arsenic	779.4686757	875.4613331	---	249.4299762	463.9945065	---	249.4299762	326.7532688	775.727226	0.122903014	0.291777384	no			
Total Cadmium	31.97584171	3.688623983	---	10.23226935	1.952850711	---	1.952850711	2.558234431	6.073365711	0.000962239	0.002284399	no			
Chromium III	3156.109258	800.5618091	---	1009.954963	424.2977358	---	424.2977358	535.8300641	1319.56603	0.209066585	0.496333649	no			
Chromium VI	18.29286031	26.76341463	---	5.853715299	14.18460976	---	5.853715299	7.668367042	18.20505458	0.002884334	0.00684754	no			
Total Copper	17.19234552	27.54407059	---	5.501530566	14.59835741	---	5.501530566	7.207031242	17.10982226	0.002710809	0.006433586	no			
Total Lead	86.91298012	7.207526531	---	27.81215364	3.819989061	---	3.819989061	5.004185671	11.88016598	0.001882244	0.004468534	no			
Total Mercury	8.508531579	0.090534236	---	2.722736505	0.047983145	---	0.047983145	0.06285792	0.149227582	2.3643E-05	5.61296E-05	no			
Total Nickel	1163.700424	275.3056027	---	372.3852877	145.9119684	---	145.9119684	191.14468	453.7862249	0.071896013	0.170684428	no			
Total Zinc	144.4227996	278.3734473	---	46.21529587	147.5379271	---	46.21529587	60.54203759	143.7295702	0.022771919	0.054061578	no			
Total Cyanide	52.47764302	13.13840355	---	16.79284576	6.96335388	---	6.96335388	9.121993583	21.65603057	0.003431092	0.008145369	no			
DIOXIN															
2,3,7,8 TCDD, dioxin	---	---	1.75E-06	---	---	1.75E-06	1.75E-06	1.75E-06	4.17E-06	6.59E-10	1.57E-09	no			
VOLATILE COMPOUNDS															
Benzene	2571.290177	2737.167406	30.41297118	822.8128568	1450.698725	30.41297118	30.41297118	72.3828714	0.011439353	0.027223659	no				
Bromoform	3349.880044	3564.400222	84.42640798	1071.961614	1889.132118	84.42640798	84.42640798	200.334851	0.031755643	0.075578429	no				
Bromodichloromethane	---	---	8.02902439	---	---	8.02902439	8.02902439	19.10907805	0.003019989	0.007187574	no				
Carbon Tetrachloride	3121.21929	3321.096452	2.919645233	998.7901729	1760.18112	2.919645233	2.919645233	6.948755654	0.001098178	0.002613663	no				
Chloroform	3304.147894	3515.739468	170.3126386	1057.327326	1863.341918	170.3126386	170.3126386	405.3440798	0.064060374	0.15246369	no				
Dibromochloromethane	---	---	12.35983149	---	---	12.35983149	12.35983149	29.41638947	0.004648953	0.011064508	no				
1,2-Dichloroethane (EDC)	13490.98448	14354.92229	16.54465632	4317.115033	7608.108899	16.54465632	16.54465632	39.37628204	0.006223008	0.011481078	no				
1,1-Dichloroethylene	1326.233373	1411.161863	424.2943592	747.9157871	1411.161863	1411.161863	1411.161863	3.358562333	0.000530786	0.001263271	no				
1,3-Dichloropropylene	692.8420843	737.2104213	396.0742062	221.709467	390.7215233	396.0742062	221.709467	290.4394017	689.5164423	0.109244134	0.239350577	no			
Ethylbenzene	3658.572062	3892.86031	19707.60532	1170.74306	2063.215965	19707.60532	20122.14634	26360.01171	62579.87512	9.914896644	23.53841875	no			
Methyl Chloride	62881.76732	66908.53659	---	20122.14634	35461.52439	---	20122.14634	26360.01171	62579.87512	9.914896644	23.53841875	no			
Methylene Chloride	22065.76275	23478.81375	211.6742794	7061.04408	12443.77129	211.6742794	211.6742794	211.6742794	503.7847849	0.079617893	0.189490586	no			
1,1,2,2-Tetrachloro- ethane	1065.559113	1133.795565	4.379467849	340.9789162	600.9116497	4.379467849	4.379467849	4.379467849	10.42313348	0.001647267	0.003920495	no			

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APPENDIX B-2

**Documentation and Explanation of
Water Quality Screen and
Associated Lotus Spreadsheet**

APPENDIX B-2
LA0078484/AI 52278/PER20050001

**Documentation and Explanation of Water Quality Screen
and Associated Lotus Spreadsheet**

Each reference column is marked by a set of parentheses enclosing a number and asterisk, for example (*1) or (*19). These columns represent inputs, existing data sets, calculation points, and results for determining Water Quality Based Limits for an effluent of concern. The following represents a summary of information used in calculating the water quality screen:

Receiving Water Characteristics:

Receiving Water: unnamed ditch; thence into Bayou Sylvain; thence into Bayou Bourbeux

Critical Flow, Qrc (cfs): 0.1 cfs

Harmonic Mean Flow, Qrh (cfs): cfs

Segment(s) No.: 060801

Receiving Stream Hardness: mg/l

Receiving Stream TSS: mg/l

MZ Stream Factor, Fs: 1.0 cfs

Plume distance, Pf: N/A

Effluent Characteristics:

Company: Total Environmental Solutions, Inc. / Med South

Facility flow, Qe (MGD): 0.0451 MGD

Effluent Hardness: N/A

Effluent TSS: N/A

Pipe/canal width, Pw: N/A

Permit Number: LA0078484

Variable Definition:

Qrc, critical flow of receiving stream: 0.1 cfs

Qrh, harmonic mean flow of the receiving stream, cfs

Pf = Allowable plume distance in feet, specified in LAC 33.IX.1115.D

Pw = Pipe width or canal width in feet

Qe, total facility flow, 0.0451 MGD

Fs, stream factor from LAC.IX.33.11 (1 for harmonic mean flow)

Cu, ambient concentration, ug/L

Cr, numerical criteria from LAC.IX.1113, Table 1

WLA, wasteload allocation

LTA, long term average calculations

WQBL, effluent water quality based limit

ZID, Zone of Initial Dilution in % effluent

MZ, Mixing Zone in % effluent

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Formulas used in aquatic life water quality screen (dilution type WLA):

Streams: Dilution Factor =
$$\frac{Q_e}{(Q_{rc} \times 0.6463 \times F_s + Q_e)}$$

$$WLA_{a,c,h} = \frac{Cr}{\text{Dilution Factor}} - \frac{(F_s \times Q_{rc} \times 0.6463 \times Cu)}{Q_e}$$

Static water bodies (in the absence of a site specific dilution):

Discharge from a pipe:

Discharge from a canal:

Critical

$$\text{Dilution} = \frac{(2.8) P_w \pi^{1/2}}{Pf}$$

Critical

$$\text{Dilution} = \frac{(2.38)(P_w^{1/2})}{(Pf)^{1/2}}$$

$$WLA = \frac{(Cr-Cu) Pf}{(2.8) P_w \pi^{1/2}}$$

$$WLA = \frac{(Cr-Cu) Pf^{1/2}}{2.38 P_w^{1/2}}$$

Formulas used in human health water quality screen, human health non-carcinogens (dilution type WLA):

Streams:

$$\text{Dilution Factor} = \frac{Q_e}{(Q_{rc} \times 0.6463 + Q_e)}$$

$$WLA_{a,c,h} = \frac{Cr}{\text{Dilution Factor}} - \frac{(Q_{rc} \times 0.6463 \times Cu)}{Q_e}$$

Formulas used in human health water quality screen, human health carcinogens (dilution type WLA):

$$\text{Dilution Factor} = \frac{Q_e}{(Q_{rh} \times 0.6463 + Q_e)}$$

$$WLA_{a,c,h} = \frac{Cr}{\text{Dilution Factor}} - \frac{(Q_{rh} \times 0.6463 \times Cu)}{Q_e}$$

Static water bodies in the absence of a site specific dilution (human health carcinogens and human health non-carcinogens):

Discharge from a pipe:

Discharge from a canal:

Critical

$$\text{Dilution} = \frac{(2.8) P_w \pi^{1/2}}{Pf}$$

Critical

$$\text{Dilution} = \frac{(2.38)(P_w^{1/2})}{(Pf)^{1/2}}$$

$$WLA = \frac{(Cr-Cu) Pf^*}{(2.8) P_w \pi^{1/2}}$$

$$WLA = \frac{(Cr-Cu) Pf^{1/2*}}{2.38 P_w^{1/2}}$$

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* Pf is set equal to the mixing zone distance specified in LAC 33:IX.1115 for the static water body type, i.e., lake, estuary, Gulf of Mexico, etc.
If a site specific dilution is used, WLA are calculated by subtracting Cu from Cr and dividing by the site specific dilution for human health and aquatic life criteria.

$$WLA = \frac{(Cr - Cu)}{\text{site specific dilution}}$$

Longterm Average Calculations:

$$LTAA = WLAa \times 0.32$$

$$LTAc = WLAc \times 0.53$$

$$LTAh = WLAh$$

WQBL Calculations:

Select most limiting LTA to calculate daily max and daily avg WQBL

If aquatic life LTA is more limiting:

$$\text{Daily Maximum} = \text{Min}(LTAA, LTAc) \times 3.11$$

$$\text{Monthly Average} = \text{Min}(LTAc, LTAh) \times 1.31$$

If human health LTA is more limiting:

$$\text{Daily Maximum} = LTAh \times 2.38$$

$$\text{Monthly Average} = LTAh$$

Mass Balance Formulas:

$$\text{mass (lbs/day)}: (\text{ug/L}) \times 1/1000 \times (\text{flow, MGD}) \times 8.34 = \text{lbs/day}$$

$$\text{concentration(ug/L)}: \frac{\text{lbs/day}}{(\text{flow, MGD}) \times 8.34 \times 1/1000} = \text{ug/L}$$

The following is an explanation of the references in the spreadsheet.

- (*1) Parameter being screened.
- (*2) Instream concentration for the parameter being screened in ug/L. In the absence of accurate supporting data, the instream concentration is assumed to be zero (0).
- (*3) Monthly average effluent value in concentration units of ug/L or mass units of lbs/day. Units determined on a case-by-case basis as appropriate to the particular situation.
- (*4) Daily maximum value in concentration units of ug/L or mass units of lbs/day. Units determined on a case-by-case basis as appropriate to the particular situation.
- (*5) Minimum analytical Quantification Levels (MQL's). Established in a letter dated January 27, 1994 from Wren Stenger of EPA Region 6 to Kilren Vidrine of LDEQ and from the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". The applicant must test for the parameter at a level at least as sensitive as the specified MQL. If

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this is not done, the MQL becomes the application value for screening purposes if the pollutant is suspected to be present on-site and/or in the waste stream. Units are in ug/l or lbs/day depending on the units of the effluent data.

- (*6) States whether effluent data is based on 95th percentile estimation. A "1" indicates that a 95th percentile approximation is being used, a "0" indicates that no 95th percentile approximation is being used.
- (*7) 95th percentile approximation multiplier (2.13). The constant, 2.13, was established in memorandum of understanding dated October 8, 1991 from Jack Ferguson of Region 6 to Jesse Chang of LDEQ and included in the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". This value is screened against effluent Water Quality Based Limits established in columns (*18) - (*21). Units are in ug/l or lbs/day depending on the units of the measured effluent data.
- (*8) LAC 33.IX.1113.C.6, Table 1, Numerical Criteria for Specific Toxic Substances, freshwater (FW) or marine water (MW) (whichever is applicable) aquatic life protection, acute criteria. Units are specified. Some metals are hardness dependent. The hardness of the receiving stream shall generally be used, however a flow weighted hardness may be determined in site-specific situations using the following formula: $(\text{Effluent Hardness} \times \text{ZID Dilution} + \text{Receiving Stream Hardness} \times (1 - \text{ZID Dilution}))$. Dissolved metals are converted to Total metals using partition coefficients in accordance with the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". Similar to hardness, the TSS of the receiving stream shall generally be used, however, a flow weighted TSS may be determined in site-specific situations using the following formula: $(\text{Effluent TSS} \times \text{ZID Dilution} + \text{Receiving Stream TSS} \times (1 - \text{ZID Dilution}))$.

Hardness Dependent Criteria:

<u>Metal</u>	<u>Formula</u>
Cadmium	$e^{(1.1280[\ln(\text{hardness})] - 1.6774)}$
Chromium III	$e^{(0.8190[\ln(\text{hardness})] + 3.6880)}$
Copper	$e^{(0.9422[\ln(\text{hardness})] - 1.3884)}$
Lead	$e^{(1.2730[\ln(\text{hardness})] - 1.4600)}$
Nickel	$e^{(0.8460[\ln(\text{hardness})] + 3.3612)}$
Zinc	$e^{(0.8473[\ln(\text{hardness})] + 0.8604)}$

Dissolved to Total Metal Multipliers for Freshwater Streams (TSS dependent):

<u>Metal</u>	<u>Multiplier</u>
Arsenic	$1 + 0.48 \times \text{TSS}^{-0.73} \times \text{TSS}$
Cadmium	$1 + 4.00 \times \text{TSS}^{-1.13} \times \text{TSS}$
Chromium III	$1 + 3.36 \times \text{TSS}^{-0.93} \times \text{TSS}$
Copper	$1 + 1.04 \times \text{TSS}^{-0.74} \times \text{TSS}$
Lead	$1 + 2.80 \times \text{TSS}^{-0.80} \times \text{TSS}$
Mercury	$1 + 2.90 \times \text{TSS}^{-1.14} \times \text{TSS}$
Nickel	$1 + 0.49 \times \text{TSS}^{-0.57} \times \text{TSS}$
Zinc	$1 + 1.25 \times \text{TSS}^{-0.70} \times \text{TSS}$

Dissolved to Total Metal Multipliers for Marine Environments (TSS dependent):

<u>Metal</u>	<u>Multiplier</u>
Copper	$1 + (10^{4.86} \times \text{TSS}^{-0.72} \times \text{TSS}) \times 10^{-6}$
Lead	$1 + (10^{6.06} \times \text{TSS}^{-0.85} \times \text{TSS}) \times 10^{-6}$
Zinc	$1 + (10^{5.36} \times \text{TSS}^{-0.52} \times \text{TSS}) \times 10^{-6}$

If a metal does not have multiplier listed above, then the dissolved to total metal multiplier shall be 1.

- (*9) LAC 33.IX.1113.C.6, Table 1, Numerical Criteria for Specific Toxic Substances, freshwater (FW) or marine water (MW) (whichever is applicable) aquatic life protection, chronic criteria. Units are specified. Some metals are hardness dependent. The hardness of the receiving stream shall generally be used, however a flow weighted hardness may be determined in site-specific situations using the following formula: (Effluent Hardness X MZ Dilution + Receiving Stream Hardness X (1 - MZ Dilution)). Dissolved metals are converted to Total metals using partition coefficients in accordance with the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". Similar to hardness, the TSS of the receiving stream shall generally be used,

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however, a flow weighted TSS may be determined in site-specific situations using the following formula: (Effluent TSS X MZ Dilution + Receiving Stream TSS X (1-MZ Dilution)).

Hardness dependent criteria:

<u>Metal</u>	<u>Formula</u>
Cadmium	$e^{(0.7852[\ln(\text{hardness})] - 3.4900)}$
Chromium III	$e^{(0.8473[\ln(\text{hardness})] + 0.7614)}$
Copper	$e^{(0.8545[\ln(\text{hardness})] - 1.3860)}$
Lead	$e^{(1.2730[\ln(\text{hardness})] - 4.7050)}$
Nickel	$e^{(0.8460[\ln(\text{hardness})] + 1.1645)}$
Zinc	$e^{(0.8473[\ln(\text{hardness})] + 0.7614)}$

Dissolved to total metal multiplier formulas are the same as (*8), acute numerical criteria for aquatic life protection.

- (*10) LAC 33.IX.1113.C.6, Table 1, Numerical Criteria for Specific Toxic Substances, human health protection, drinking water supply (HHDW), non-drinking water supply criteria (HHNDW), or human health non-primary contact recreation (HHNPCR) (whichever is applicable). A DEQ and EPA approved Use Attainability Analysis is required before HHNPCR is used, e.g., Monte Sano Bayou. Units are specified.
- (*11) C if screened and carcinogenic. If a parameter is being screened and is carcinogenic a "C" will appear in this column.
- (*12) Wasteload Allocation for acute aquatic criteria (WLAa). Dilution type WLAa is calculated in accordance with the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". Negative values indicate that the receiving water is not meeting the acute aquatic numerical criteria for that parameter. Units are in ug/L. Dilution WLAa formulas for streams:

$$WLAa = (Cr/Dilution\ Factor) - \frac{(Fs \times Q_{rc} \times 0.6463 \times Cu)}{Q_e}$$

Dilution WLAa formulas for static water bodies:

$$WLAa = (Cr - Cu)/Dilution\ Factor$$

Cr represents aquatic acute numerical criteria from column (*8).

If Cu data is unavailable or inadequate, assume Cu=0

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- (*13) Wasteload Allocation for chronic aquatic criteria (WLAc). Dilution type WLAc is calculated in accordance with the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". Negative values indicate that the receiving water is not meeting the chronic aquatic numerical criteria for that parameter. Units are in ug/L. Dilution WLAc formula:

$$WLAc = (Cr/Dilution Factor) - \frac{(Fs \times Qrc \times 0.6463 \times Cu)}{Qe}$$

Dilution WLAc formulas for static water bodies:

$$WLAc = (Cr - Cu)/Dilution Factor$$

Cr represents aquatic chronic numerical criteria from column (*9).
If Cu data is unavailable or inadequate, assume Cu=0

- (*14) Wasteload Allocation for human health criteria (WLAh). Dilution type WLAh is calculated in accordance with the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards". Negative values indicate that the receiving water is not meeting the human health numerical criteria for that parameter. Units are in ug/L. Dilution WLAh formula:

$$WLAh = (Cr/Dilution Factor) - \frac{(Fs \times Qrc, Qrh \times 0.6463 \times Cu)}{Qe}$$

Dilution WLAh formulas for static water bodies:

$$WLAh = (Cr - Cu)/Dilution Factor$$

Cr represents human health numerical criteria from column (*10).

If Cu data is unavailable or inadequate, assume Cu=0

- (*15) Long Term Average for aquatic numerical criteria (LTAA). WLAA numbers are multiplied by a multiplier specified in the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards" which is 0.32. $WLAA \times 0.32 = LTAA$
- (*16) Long Term Average for chronic numerical criteria (LTAc). WLAc numbers are multiplied by a multiplier specified in the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards" which is 0.53. $WLAc \times 0.53 = LTAc$
- (*17) Long Term Average for human health numerical criteria (LTAh). WLAh numbers are multiplied by a multiplier specified in the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards" which is 1. $WLAc \times 1 = LTAh$
- (*18) Limiting Acute, Chronic or Human Health LTA's. The most limiting LTA is placed in this column. Units are consistent with the WLA calculation.
- (*19) End of pipe Water Quality Based Limit (WQBL) maximum 30-day monthly average in terms of concentration, ug/L. If aquatic life criteria was the most limiting LTA then the limiting LTA is multiplied by 1.31 to determine the average WQBL ($LTA_{limiting aquatic} \times 1.31 = WQBL_{daily average}$). If human health criteria was the most limiting criteria then $LTAh = WQBL_{daily average}$.

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- (*20) End of pipe Water Quality Based Limit (WQBL) 30-day daily maximum in terms of concentration, ug/L. If aquatic life criteria was the most limiting LTA then the limiting LTA is multiplied by 3.11 to determine the daily maximum WQBL ($LTA_{\text{limiting aquatic}} \times 3.11 = WQBL_{\text{daily max}}$). If human health criteria was the most limiting criteria then LTA_h is multiplied by 2.38 to determine the daily maximum WQBL ($LTA_{\text{limiting aquatic}} \times 2.38 = WQBL_{\text{daily max}}$).
- (*21) End of pipe Water Quality Based Limit (WQBL) maximum 30-day monthly average in terms of mass, lbs/day. The mass limit is determined by using the mass balance equations above. Daily average WQBL, $ug/l/1000 \times \text{facility flow, MGD} \times 8.34 = \text{daily average WQBL, lbs/day}$.
- (*22) End of pipe Water Quality Based Limit (WQBL) 30 day daily maximum in terms of mass, lbs/day. Mass limit is determined by using the mass balance equations above. Daily maximum WQBL, $ug/l/1000 \times \text{facility flow, MGD} \times 8.34 = \text{daily maximum WQBL, lbs/day}$.